

United States Courts
Southern District of Texas
FILED

Michael N. Milby, Clerk of Court

HOUSTON DIVISION

§

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§ CRIMINAL NO. *H-03-221*

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THE GRAND JURY CHARGES:

COUNT ONE

A. INTRODUCTION

At all times material to this indictment:

1. Defendant **KARLA PATRICIA CHAVEZ JOYA** was an individual who concealed, harbored, and transported aliens who she had smuggled into the United States and also coordinated and facilitated the transportation of aliens who had been smuggled into the United States by others, including defendants **VICTOR SANCHEZ RODRIGUEZ** and **OCTAVIO TORRES ORTEGA**.
2. Defendants **ABELARDO FLORES** and **ALFREDO GARCIA** were individuals who assisted defendant **KARLA PATRICIA CHAVEZ JOYA** in the transportation of aliens who had illegally entered the United States.
3. Defendant **VICTOR SANCHEZ RODRIGUEZ** was an individual who concealed and harbored aliens, whom he had smuggled into the United States, and who was assisted in these illegal activities by his wife, defendant **EMMA SAPATA RODRIGUEZ**, and his son, defendant **VICTOR JESUS RODRIGUEZ**.
4. Defendant **OCTAVIO TORRES ORTEGA** was an individual who concealed and harbored aliens whom he had smuggled into the United States and who was assisted in these illegal activities by defendant **ROSA SARRATA GONZALEZ**.

5. Defendant **NORMA GONZALEZ SANCHEZ** was an individual who coordinated and assisted the smuggling of aliens into the United States.

6. Defendant **CLAUDIA CARRIZALES DE VILLA** was an individual who concealed, harbored and fed smuggled aliens for defendant **KARLA PATRICIA CHAVEZ JOYA**.

7. Defendant **TYRONE MAPLETOFT WILLIAMS** was an individual who was recruited by defendant **ABELARDO FLORES** to transport smuggled aliens from the Rio Grande Valley area to other parts of the United States.

8. Defendant **FATIMA HOLLOWAY** was an individual who assisted defendant **TYRONE MAPLETOFT WILLIAMS** in transporting smuggled aliens from the Rio Grande Valley area to other parts of the United States.

9. The following properties were used as drop houses, namely, residences or buildings used for the purpose of concealing, harboring, and shielding from detection aliens who had come to, entered, and remained in the United States in violation of law until they were ready for transportation to other parts of the United States:

- a. 3100 McAllen Road, Brownsville, Texas
- b. 290 Roberta Circle, San Benito, Texas
- c. 601 South 17th Street, Apartment #24, Harlingen, Texas

B. THE CONSPIRACY

10. From on or about May 1, 2003, to on or about May 14, 2003, in the Southern District of Texas, within the jurisdiction of this Court, and elsewhere,

**KARLA PATRICIA CHAVEZ JOYA,
ABELARDO FLORES,
ALFREDO GARCIA,
VICTOR SANCHEZ RODRIGUEZ,
EMMA SAPATA RODRIGUEZ,
VICTOR JESUS RODRIGUEZ,
OCTAVIO TORRES ORTEGA,
ROSA SARRATA GONZALEZ,
NORMA GONZALEZ SANCHEZ,
CLAUDIA CARRIZALES DE VILLA,
TYRONE MAPLETOFT WILLIAMS,
and
FATIMA HOLLOWAY,**

defendants herein, knowing and in reckless disregard of the fact that Norberto Yanez-Salas, Enrique Ortega-Cuate, Jorge Armando Hernandez-Ramos, Lorena Osorio-Mendez, Arturo Martinez-Ramos, Jose Refugio Ramos-Martinez, Jose Juan Roldan-Castro, Lorenzo Otero Marquez, Fabiola Angelica Gonzalez-Buendia, Dilcia Xiomara Zambrano Molina, Lucy Maribel Sierra-Urquia, Efrain Elio Landaverde-Santos, Maria Leticia Lara Castro, Maria Elena Castro-Reyes, Doris Sulema Argueta, Daisy Yamileth Hernandez-Ortiz, David Fernando Amaya-Leon, Ana Gladis Marquez Aguiluz, Celia Del Carmen Diaz Marquez, Serafin Rivera-Gamez, Roberto Rivera-Gamez, Marco Antonio Villasenor-

Acuna, Jose Antonio Villaseñor-Leon, Jose Luis Ramirez-Bravo, Elisendo Cabanas-Gonzalez, Edgar Gabriel Hernandez-Zuniga, Juan Carlos Castillo-Loredo, Ricardo Gonzalez-Mata, Oscar Gonzalez-Guerrero, Catarino Gonzalez-Merino, Juan Jose Morales-Tovar, Mateo Salgado-Perez, Hector Ramirez-Robles, Jose Felicitio Figueroa-Gutierrez, Jorge Mauricio Torres-Herrera, and Stanley Augusto Vargas were aliens who had come to, entered, and remained in the United States in violation of law, did knowingly conspire and agree with each other and with others known and unknown to the Grand Jury, to conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection said aliens in furtherance of such violation of law within the United States, and to transport, move, attempt to transport, and attempt to move said aliens in furtherance of such violation of law within the United States, namely, from a location at or near Harlingen, Texas to another location at or near Victoria, Texas and other places, by means of a semi-tractor-trailer rig, for the purpose of commercial advantage and private financial gain. During and in relation to said violation the defendants caused serious injury to a person, placed in jeopardy the life of a person, and the death of a person resulted.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i), 1324(a)(1)(B)(iii), and

1324(a)(1)(B)(iv).

C. THE MANNER AND MEANS OF THE CONSPIRACY

It was a part of the conspiracy that defendants:

11. KARLA PATRICIA CHAVEZ JOYA ("CHAVEZ"), ABELARDO FLORES ("FLORES"), ALFREDO GARCIA ("GARCIA"), VICTOR SANCHEZ RODRIGUEZ ("RODRIGUEZ"), EMMA SAPATA RODRIGUEZ ("EMMA"), VICTOR JESUS RODRIGUEZ ("VICTOR"), OCTAVIO TORRES ORTEGA ("TORRES"), ROSA SARRATA GONZALEZ ("GONZALEZ"), NORMA GONZALEZ SANCHEZ ("SANCHEZ"), CLAUDIA CARRIZALES DE VILLA ("CARRIZALES"), TYRONE MAPLETOFT WILLIAMS ("WILLIAMS"), and FATIMA HOLLOWAY ("HOLLOWAY"), would and did harbor, conceal, shield from detection, and transport aliens who had come to, entered, and remained in the United States in violation of law.

12. CHAVEZ would and did employ others to recruit drivers and to maintain drop houses where smuggled aliens could be concealed, harbored, and shielded from detection before being transported into other parts of the United States.

13. CHAVEZ would and did provide transportation to aliens smuggled by others, including defendants RODRIGUEZ and TORRES, by coordinating and

arranging the arrival of vehicles for the purpose of transporting smuggled aliens to other parts of the United States.

14. RODRIGUEZ would and did operate and maintain a drop-house network in conjunction with EMMA and VICTOR.

15. RODRIGUEZ would and did coordinate and facilitate the concealing, harboring, and shielding from detection, of smuggled aliens from the Rio Grande Valley to other parts of the United States.

16. RODRIGUEZ would and did coordinate with CHAVEZ for the transportation of aliens whom he had smuggled into the United States.

17. CHAVEZ would and did employ others to escort vehicles containing smuggled aliens between locations at or near Harlingen, Texas and their destinations at locations at or near Houston, Texas.

18. TORRES would and did work with CHAVEZ and GONZALEZ to ensure that smuggled aliens were concealed, harbored, and shielded from detection in drop houses and other locations until they could be transported to other parts of the United States.

19. GONZALEZ would and did operate and maintain a drop house in San Benito, Texas, which was utilized to conceal, harbor, and shield from detection smuggled aliens until they were transported from the Harlingen, Texas area to the

Houston, Texas area.

20. GONZALEZ would and did travel to Mexico to smuggle into the United States nationals of other countries, including but not limited to nationals of Mexico and Honduras.

21. SANCHEZ would and did advise aliens, who were seeking to illegally enter the United States, whom they were to contact and where they were to go in Mexico.

22. SANCHEZ would and did receive smuggling fees from relatives and friends of smuggled aliens.

23. CARRIZALES would and did provide food to smuggled aliens being concealed, harbored, and shielded from detection at various drop houses in the Harlingen, Texas, area from a restaurant owned by CHAVEZ and operated by CARRIZALES.

24. FLORES and GARCIA, at the direction of CHAVEZ, would and did employ WILLIAMS to transport aliens who had come to, entered, and remained in the United States in violation of law, from the Rio Grande Valley to other parts of the United States.

25. WILLIAMS would and did travel to the Rio Grande Valley in a semi-tractor-trailer rig to transport smuggled aliens to other parts of the United States.

26. WILLIAMS would and did conceal, harbor, shield from detection and transport smuggled aliens to other parts of the United States in the trailer of a semi-tractor-trailer rig.

D. OVERT ACTS

27. For the purpose of accomplishing the objects of the conspiracy, the following overt acts, among others, were committed in the Southern District of Texas and elsewhere:

(1) On or about May 8, 2003, TORRES directed and controlled the crossing of the Rio Grande from Mexico into the United States of eight aliens, which included Jorge Armando **Hernandez**-Ramos ("Hernandez"), a Mexican national, and arranged for their transportation to a drop house in Harlingen, Texas.

(2) On or about May 7, 2003, an unknown unindicted female co-conspirator coached Jose Juan **Roldan**-Castro ("Roldan"), a Mexican national, and another smuggled alien, to falsely claim United States citizenship to an inspector at the international port-of-entry at Hidalgo, Texas.

(3) On or about May 8, 2003, SARRATA concealed Roldan at a drop house located at 290 Roberta Circle in San Benito, Texas.

(4) On or about May 8, 2003, TORRES delivered food to aliens concealed in an unidentified drop house located at or near San Benito, Texas.

(5) On or about May 8, 2003, TORRES smuggled Norberto Yanez-Salas ("Yanez"), Arturo Ramos-Martinez ("Arturo Ramos"), Jose Ramos-Martinez ("Jose Ramos"), and Jorge Armando Hernandez-Ramos ("Jorge Hernandez"), all Mexican nationals, across the Rio Grande from Mexico into the United States each for \$1,800 in U.S. currency.

(6) On or about May 8, 2003, TORRES caused an unindicted male co-conspirator who identified himself as "Wicho" (Phonetic) to transport Yanez, Arturo Ramos, Jose Ramos, and Jorge Hernandez to a house near Harlingen, Texas.

(7) On or about May 11, 2003, TORRES directed Yanez' sister, Elsa Yanez-Salas ("Elsa Yanez"), to send a partial payment of Yanez' smuggling fee, in the amount of \$850 in U.S. currency, via Western Union wire transfer, to San Benito, Texas with a recipient designation of "Norberto Yanez-Salas."

(8) On or about May 11, 2003, Wicho caused Luisa Martinez to send TORRES a partial payment of the smuggling fees for Arturo Ramos, Jose Ramos, and Jorge Hernandez, in the amount of \$1,800 in U.S. currency, via Western Union wire transfer, to San Benito, Texas with a recipient designation of "Arturo Ramos."

(9) On or about May 13, 2003, unknown unindicted co-conspirators transported Yanez, Arturo Ramos, Jose Ramos, and Jorge Hernandez to a location

at or near Harlingen, Texas.

(10) On or about May 10, 2003, TORRES arranged for Lorenzo Otero-Marquez ("Otero"), a Mexican national, to be taken across the Rio Grande from Mexico into the United States, via inner tube.

(11) On or about May 10, 2003, unknown unindicted co-conspirators transported Otero to a drop house near Harlingen, Texas.

(12) On or about May 11, 2003, TORRES caused a friend of Otero's named Pedro Ortega to send \$1,600 in U.S. currency, via Western Union wire transfer, with a recipient designation of "Lorenzo Otero," as a partial payment of Otero's smuggling fees.

(13) On or about May 13, 2003, unknown unindicted co-conspirators transported Otero to a location at or near Harlingen, Texas.

(14) On or about May 9, 2003, unknown unindicted co-conspirators transported Efrain Elio Landaverde-Santos ("Landaverde"), a Honduran national, to a house in the 3000 block of McAllen Road in Brownsville, Texas, which was being operated by RODRIGUEZ as a drop house.

(15) On or about May 9, 2003, RODRIGUEZ contacted and directed Landaverde's brother, Saul Landaverde-Santos ("Saul"), to send \$1,000 in U.S. currency as a partial payment of Landaverde's smuggling fee, via Western Union

wire transfer, with a recipient designation of "Victor Rodriguez."

(16) On or about May 13, 2003, unknown unindicted co-conspirators transported Landaverde to a location at or near Harlingen, Texas.

(17) On or about May 12, 2003, RODRIGUEZ and EMMA picked up Enrique **Ortega-Cuate** ("Ortega"), a Mexican national, after he had crossed the Rio Grande illegally from Matamoros, Mexico to Brownsville, Texas.

(18) On or about May 12, 2003, RODRIGUEZ and EMMA transported Ortega to a trailer house in the 3000 block of McAllen Road in Brownsville, Texas.

(19) On or about May 13, 2003, RODRIGUEZ and EMMA drove Ortega to Harlingen, Texas where all three met with CHAVEZ at a restaurant and where EMMA delivered an envelope containing money to CHAVEZ.

(20) On or about May 13, 2003, EMMA drove Ortega to an unknown location where EMMA exchanged vehicles with VICTOR.

(21) On or about May 13, 2003, VICTOR transported Ortega to a location at or near Harlingen, Texas.

(22) On or about May 10, 2003, RODRIGUEZ caused Marlo **Guevara** ("Guevara") to send \$800 in U.S. currency to RODRIGUEZ, via Western Union wire transfer, from Oklahoma to Brownsville, Texas with a recipient designation of "Victor Rodriguez" as a partial payment of the smuggling fee for Guevara's

cousin, Dilcia Xiomara **Zambrano** Molina ("Zambrano"), a Honduran national.

(23) On or about May 12, 2003, unknown unindicted co-conspirators aided **Zambrano** and approximately twelve (12) other aliens, in crossing the Rio Grande illegally from Mexico into the United States.

(24) On or about May 12, 2003, unknown unindicted co-conspirators transported **Zambrano** to a drop house operated and maintained by **RODRIGUEZ**.

(25) On or about May 12, 2003, at **RODRIGUEZ**' direction, **VICTOR** transported **Zambrano** to a drop house.

(26) On or about May 13, 2003, unknown unindicted co-conspirators transported **Zambrano** to a location at or near Harlingen, Texas.

(27) On or about May 9, 2003, an unindicted co-conspirator, who identified himself as "Jesus Marquez," smuggled Maria Leticia **Lara** Castro ("Lara"), Doris Sulema **Argueta** ("Argueta"), Maria Elena **Castro-Reyes** ("Castro"), Castro's three-year-old son ("A.N.C."), and Daisy Yamileth **Hernandez-Ortiz** ("Hernandez"), all Honduran nationals, to Matamoros, Mexico.

(28) On or about May 9, 2003, Jesus Marquez provided Castro with a telephone number for her use in contacting **RODRIGUEZ** and provided the name of "Don Victor" as an identifier for **RODRIGUEZ**.

(29) On or about May 9, 2003, RODRIGUEZ told Castro that an unindicted co-conspirator named "Marcos" would pick Castro, Lara, and Argueta up and assist them in their illegal entry into the United States.

(30) On or about May 9, 2003, EMMA picked up Castro's three-year-old son, A.N.C., in Matamoros, Mexico, to transport him illegally from Mexico into the United States through the international port-of-entry at Brownsville.

(31) On or about May 10, 2003, two unindicted male co-conspirators, one of which identified himself as "Marcos", aided Lara, Argueta, Castro, and Hernandez in illegally crossing the Rio Grande, via inner tubes, from Mexico into the United States.

(32) On or about May 10, 2003, VICTOR, picked up Lara, Argueta, Castro, and Hernandez and transported them to a drop house operated and maintained by RODRIGUEZ.

(33) On or about May 12, 2003, RODRIGUEZ caused Vilma Suyapa Jimenez to send \$1,400 in U.S. currency to RODRIGUEZ, via Western Union wire transfer, from Miami, Florida to Brownsville, Texas, with a recipient designation of "Victor Rodriguez," as partial payment of the smuggling fees for Lara and Argueta.

(34) On or about May 12, 2003, VICTOR transported Lara, Argueta, Castro, and Hernandez to another drop house.

(35) On or about May 12, 2003, EMMA retrieved A.N.C. from Castro to transport A.N.C. to Houston, Texas.

(36) On or about May 13, 2003, unknown unindicted co-conspirators transported Lara, Argueta, Castro, and Hernandez to a location at or near Harlingen, Texas.

(37) On or about May 7, 2003, CHAVEZ and CARRIZALES picked up Lorena Osorio-Mendez ("Osorio"), a Mexican national, and transported her to CARRIZALES' apartment, Apartment #24 located at 601 South 17th Street, Harlingen, Texas.

(38) On or about May 7, 2003, CARRIZALES concealed Osorio at Apartment #24, located at 601 South 17th Street, Harlingen, Texas.

(39) On or about May 13, 2003, CHAVEZ directed Osorio to pay CHAVEZ a smuggling fee of \$1,000 in U.S. currency and told Osorio that another payment of \$900 in U.S. currency would be due upon Osorio's arrival in the Houston, Texas area.

(40) On or about May 13, 2003, CHAVEZ received a smuggling fee of \$1,000 in U.S. currency from Osorio.

(41) On or about May 13, 2003, CHAVEZ transported Osorio, along with two unknown males, to a location at or near Harlingen, Texas.

(42) On or about May 7, 2003, two unknown unindicted male co-conspirators aided Ana Gladis **Marquez** Aguiluz ("Marquez") and Celia Del Carmen **Diaz** Marquez ("Diaz"), El Salvadoran nationals, in crossing the Rio Grande illegally from Matamoros, Mexico into Brownsville, Texas.

(43) On or about May 7, 2003, CHAVEZ directed an unknown unindicted male co-conspirator to transport Marquez and Diaz to a drop house.

(44) On or about May 13, 2003, CHAVEZ told Marquez and Diaz that she needed more money.

(45) On or about May 13, 2003, CHAVEZ told Diaz' friend, Santos **Umana** ("Umana"), that additional smuggling fees were due.

(46) On or about May 13, 2003, CHAVEZ directed Marquez' sister, Alba **Alvares** Aguiluz ("Alvares"), to send \$1,500 in U.S. currency, via Western Union wire transfer, to San Benito, Texas, with a recipient name of "Maria Degollado."

(47) On or about May 13, 2003, CHAVEZ transported Marquez and Diaz to a location at or near Harlingen, Texas.

(48) On or about May 7, 2003, SANCHEZ quoted Josefina **Gonzalez** ("Josefina") a fee of \$1,900 in U.S. currency for the smuggling of Josefina's

granddaughter, Fabiola Angelica **Gonzalez-Buendia** ("Fabiola") from Mexico into the United States.

(49) On or about May 9, 2003, SANCHEZ instructed Josefina to have Fabiola travel to the Hotel Capri in Reynosa, Mexico.

(50) On May 12, 2003, SANCHEZ obtained Fabiola's room number at the Hotel Capri.

(51) On or about May 12, 2003, an unknown unindicted co-conspirator aided Fabiola in crossing the Rio Grande illegally from Mexico into the United States.

(52) On or about May 12, 2003, an unknown unindicted co-conspirator transported Fabiola to a drop house at or near Harlingen, Texas.

(53) On or about May 12, 2003, SANCHEZ received \$950 in U.S. currency from Josefina as partial payment of Fabiola's smuggling fee.

(54) On or about May 12, 2003, an unknown unindicted co-conspirator took Fabiola to a location at or near Harlingen, Texas.

(55) On or about May 8, 2003, SANCHEZ made arrangements with Aranal **Cabanas-Gonzalez** ("Cabanas") to have Cabanas' brother, Elisendo **Cabanas-Gonzalez** ("Elisendo"), smuggled into the United States.

(56) On or about May 13, 2003, SANCHEZ demanded a smuggling fee of \$900 in U.S. currency from Cabanas for Elisendo.

(57) On or about May 13, 2003, SANCHEZ received a smuggling fee of \$900 in U.S. currency from Cabanas.

(58) On or about May 13, 2003, WILLIAMS contacted FLORES and GARCIA and informed them that he was en route to Harlingen, Texas.

(59) On or about May 13, 2003, WILLIAMS contacted GARCIA and directed GARCIA to rent him a motel room.

(60) On or about May 12, 2003, HOLLOWAY traveled from San Antonio, Texas to Harlingen, Texas in a semi-tractor-trailer rig with WILLIAMS.

(61) On or about May 13, 2003, WILLIAMS and HOLLOWAY traveled through the United States Border Patrol check point in Sarita, Texas, in a semi-tractor-trailer rig loaded with aliens.

(62) On or about May 13, 2003, WILLIAMS concealed, harbored, shielded from detection, and transported in the trailer of a semi-tractor-trailer rig from a location at or near Harlingen, Texas to a location at or near Victoria, Texas, the following aliens, among others, who had come to, entered, and remained in the United States in violation of law:

- 1) Norberto Yanez-Salas, a Mexican national

- 2) Enrique **Ortega-Cuate**, a Mexican national
- 3) Jorge Armando **Hernandez-Ramos**, a Mexican national
- 4) Lorena **Osorio-Mendez**, a Mexican national
- 5) Arturo **Martinez-Ramos**, a Mexican national
- 6) Jose Refugio **Ramos-Martinez**, a Mexican national
- 7) Jose Juan **Roldan-Castro**, a Mexican national
- 8) Lorenzo **Otero Marquez**, a Mexican national
- 9) Fabiola Angelica **Gonzalez-Buendia**, a Mexican national
- 10) Dilcia Xiomara **Zambrano Molina**, a Honduran national
- 11) Lucy Maribel **Sierra-Urquia**, a Honduran national
- 12) Efrain Elio **Landaverde-Santos**, a Honduran national
- 13) Maria Leticia **Lara Castro**, a Honduran national
- 14) Maria Elena **Castro-Reyes**, a Honduran national
- 15) Doris Sulema **Argueta**, a Honduran national
- 16) Daisy Yamileth **Hernandez-Ortiz**, a Honduran national
- 17) David Fernando **Amaya-Leon**, a Honduran national
- 18) Ana Gladis **Marquez Aguiluz**, an El Salvadoran national
- 19) Celia Del Carmen **Diaz Marquez**, an El Salvadoran national
- 20) Serafin **Rivera-Gamez**, a Mexican national

- 21) Roberto Rivera-Gamez, a Mexican national
- 22) Marco Antonio Villasenor-Acuna, a Mexican national
- 23) Jose Antonio Villasenor-Leon, a Mexican national
- 24) Jose Luis Ramirez-Bravo, a Mexican national
- 25) Elisendo Cabanas-Gonzalez, a Mexican national
- 26) Edgar Gabriel Hernandez-Zuniga, a Mexican national
- 27) Juan Carlos Castillo-Loredo, a Mexican national
- 28) Ricardo Gonzalez-Mata, a Mexican national
- 29) Oscar Gonzalez-Guerrero, a Mexican national
- 30) Catarino Gonzalez-Merino, a Mexican national
- 31) Juan Jose Morales-Tovar, a Mexican national
- 32) Mateo Salgado-Perez, a Mexican national
- 33) Hector Ramirez-Robles, a Mexican national
- 34) Jose Felicito Figueroa-Gutierrez, a Honduran national
- 35) Jorge Mauricio Torres-Herrera, an El Salvadoran national
- 36) Stanley Augusto Vargas, a Dominican Republic national

(63) On or about May 14, 2003, HOLLOWAY purchased water at a location at or near Victoria, Texas for the aliens loaded in the semi-tractor-trailer rig.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(I), 1324(a)(1)(B)(i), 1324(a)(1)(B)(iii), and 1324(a)(1)(B)(iv).

COUNTS TWO through TWENTY

1. The Grand Jury re-alleges and incorporates by reference, as though set forth in full herein, paragraphs one (1) through twenty-six (26) in Count 1 of this Indictment.

2. From on or about May 1, 2003 to on or about May 14, 2003, in the Southern District of Texas, within the jurisdiction of this Court, and elsewhere,

**KARLA PATRICIA CHAVEZ JOYA,
ABELARDO FLORES,
ALFREDO GARCIA,
VICTOR SANCHEZ RODRIGUEZ,
EMMA SAPATA RODRIGUEZ,
VICTOR JESUS RODRIGUEZ,
OCTAVIO TORRES ORTEGA,
ROSA SARRATA GONZALEZ,
NORMA GONZALEZ SANCHEZ,
CLAUDIA CARRIZALES DE VILLA,
TYRONE MAPLETOFT WILLIAMS,
and
FATIMA HOLLOWAY,**

defendants herein, aided and abetted by each other and by persons known and unknown to the Grand Jury, did knowingly and in reckless disregard of the fact that the aliens identified in Counts Two (2) through Twenty (20) herein, were

aliens who had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection, and attempt to conceal, harbor, and shield from detection said aliens in furtherance of such violation of law within the United States for the purpose of commercial advantage and private financial gain. During and in relation to said violation the defendants caused serious injury to a person and placed in jeopardy the life of a person.

COUNT	ALIEN	COUNTRY
2	Norberto Yanez-Salas	Mexico
3	Enrique Ortega-Cuate	Mexico
4	Jorge Armando Hernandez-Ramos	Mexico
5	Lorena Osorio-Mendez	Mexico
6	Arturo Martinez-Ramos	Mexico
7	Jose Refugio Ramos-Martinez	Mexico
8	Jose Juan Roldan-Castro	Mexico
9	Lorenzo Otero Marquez	Mexico
10	Fabiola Angelica Gonzalez-Buendia	Mexico
11	Dilcia Xiomara Zambrano Molina	Honduras
12	Lucy Maribel Sierra-Urquia	Honduras
13	Efrain Elio Landaverde-Santos	Honduras
14	Maria Leticia Lara Castro	Honduras
15	Maria Elena Castro-Reyes	Honduras
16	Doris Sulema Argueta	Honduras

COUNT	ALIEN	COUNTRY
17	Daisy Yamileth Hernandez-Ortiz	Honduras
18	David Fernando Amaya-Leon	Honduras
19	Ana Gladis Marquez Aguiluz	El Salvador
20	Celia Del Carmen Diaz Marquez	El Salvador

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii).

COUNTS TWENTY-ONE through THIRTY-NINE

1. The Grand Jury re-alleges and incorporates by reference, as though set forth in full herein, paragraphs one (1) through twenty-six (26) in Count 1 of this Indictment.

2. From on or about May 1, 2003 to on or about May 14, 2003, in the Southern District of Texas, within the jurisdiction of this Court, and elsewhere,

KARLA PATRICIA CHAVEZ JOYA,
ABELARDO FLORES,
ALFREDO GARCIA,
VICTOR SANCHEZ RODRIGUEZ,
EMMA SAPATA RODRIGUEZ,
VICTOR JESUS RODRIGUEZ,
OCTAVIO TORRES ORTEGA,
ROSA SARRATA GONZALEZ,
NORMA GONZALEZ SANCHEZ,
CLAUDIA CARRIZALES DE VILLA,
TYRONE MAPLETOFT WILLIAMS,
and
FATIMA HOLLOWAY,

defendants herein, aided and abetted by each other and by persons known and unknown to the Grand Jury, did knowingly and in reckless disregard of the fact that the aliens identified in Counts Twenty-One (2) through Thirty-Nine (39) herein, were aliens who had come to, entered, and remained in the United States in violation of law, did transport, move, attempt to transport, and attempt to move said aliens in furtherance of such violation of law within the United States, namely, from a location at or near Harlingen, Texas to another location at or near Victoria, Texas and other places, by means of a semi-tractor-trailer rig, for the purpose of commercial advantage and private financial gain. During and in relation to said violation the defendants caused serious injury to a person and placed in jeopardy the life of a person.

COUNT	ALIEN	COUNTRY
21	Norberto Yanez-Salas	Mexico
22	Enrique Ortega-Cuate	Mexico
23	Jorge Armando Hernandez-Ramos	Mexico
24	Lorena Osorio-Mendez	Mexico
25	Arturo Martinez-Ramos	Mexico
26	Jose Refugio Ramos-Martinez	Mexico
27	Jose Juan Roldan-Castro	Mexico
28	Lorenzo Otero Marquez	Mexico
29	Fabiola Angelica Gonzalez-Buendia	Mexico

COUNT	ALIEN	COUNTRY
30	Dilcia Xiomara Zambrano Molina	Honduras
31	Lucy Maribel Sierra-Urquia	Honduras
32	Efrain Elio Landaverde-Santos	Honduras
33	Maria Leticia Lara Castro	Honduras
34	Maria Elena Castro-Reyes	Honduras
35	Doris Sulema Argueta	Honduras
36	Daisy Yamileth Hernandez-Ortiz	Honduras
37	David Fernando Amaya-Leon	Honduras
38	Ana Gladis Marquez Aguiluz	El Salvador
39	Celia Del Carmen Diaz Marquez	El Salvador

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii).

COUNTS FORTY through FIFTY-SIX

1. The Grand Jury re-alleges and incorporates by reference, as though set forth in full herein, paragraphs one (1) through twenty-six (26) in Count 1 of this Indictment.

2. From on or about May 1, 2003 to on or about May 14, 2003, in the Southern District of Texas, within the jurisdiction of this Court, and elsewhere,

KARLA PATRICIA CHAVEZ JOYA,
ABELARDO FLORES,
ALFREDO GARCIA,
VICTOR SANCHEZ RODRIGUEZ,

EMMA SAPATA RODRIGUEZ,
VICTOR JESUS RODRIGUEZ,
OCTAVIO TORRES ORTEGA,
ROSA SARRATA GONZALEZ,
NORMA GONZALEZ SANCHEZ,
CLAUDIA CARRIZALES DE VILLA,
TYRONE MAPLETOFT WILLIAMS,
and
FATIMA HOLLOWAY,

defendants herein, aided and abetted by each other and by persons known and unknown to the Grand Jury, did knowingly and in reckless disregard of the fact that the aliens identified in Counts Forty (40) through Fifty-Six (56) herein, were aliens who had come to, entered, and remained in the United States in violation of law, did transport, move, attempt to transport, and attempt to move said aliens in furtherance of such violation of law within the United States, namely, from a location at or near Harlingen, Texas to another location at or near Victoria, Texas and other places, by means of a semi-tractor-trailer rig, for the purpose of commercial advantage and private financial gain. During and in relation to said violation the defendants caused serious injury to a person, placed in jeopardy the life of a person, and the death of a person resulted.

COUNT	ALIEN	COUNTRY
40	Serafin Rivera-Gamez	Mexico
41	Roberto Rivera-Gamez	Mexico
42	Marco Antonio Villasenor-Acuna	Mexico

COUNT	ALIEN	COUNTRY
43	Jose Antonio Villasenor-Leon	Mexico
44	Jose Luis Ramirez-Bravo	Mexico
45	Elisendo Cabanas-Gonzalez	Mexico
46	Edgar Gabriel Hernandez-Zuniga	Mexico
47	Juan Carlos Castillo-Loredo	Mexico
48	Ricardo Gonzalez-Mata	Mexico
49	Oscar Gonzalez-Guerrero	Mexico
50	Catarino Gonzalez-Merino	Mexico
51	Juan Jose Morales-Tovar	Mexico
52	Mateo Salgado-Perez	Mexico
53	Hector Ramirez-Robles	Mexico
54	Jose Felicito Figueroa-Gutierrez	Honduras
55	Jose Mauricio Torres-Herrera	El Salvador
56	Stanley Augusto Vargas	Dominican Republic

All in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i), 1324(a)(1)(B)(iii), and 1324(a)(1)(B)(iv).

COUNT FIFTY-SEVEN

On or about May 14, 2003, and continuing thereafter up to and including on or about May 15, 2003, within the Southern District of Texas, within the jurisdiction of this Court, and elsewhere,

**VICTOR SANCHEZ RODRIGUEZ,
JUAN CARLOS DON JUAN,**

EMMA SAPATA RODRIGUEZ,
and
ERICA CARDENAS,

defendants herein, each aiding and abetting the other and together with other individuals known and unknown to the Grand Jury, did knowingly and in reckless disregard of the fact that a Honduran national, namely, a minor, hereinafter referred to as A.N.C. (son of Maria Elena Castro-Reyes), was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor, and shield from detection and attempt to conceal, harbor, shield from detection said alien in furtherance of such violation of law within the United States for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i).

COUNT FIFTY-EIGHT

On or about May 14, 2003, and continuing thereafter up to and including on or about May 15, 2003, within the Southern District of Texas, within the jurisdiction of this Court, and elsewhere,

VICTOR SANCHEZ RODRIGUEZ,
JUAN CARLOS DON JUAN,
EMMA SAPATA RODRIGUEZ,
and
ERICA CARDENAS,

defendants herein, each aiding and abetting the other and together with other individuals known and unknown to the Grand Jury, did knowingly and in reckless disregard of the fact that a Honduran national, namely, a minor, hereinafter referred to as A.N.C. (son of Maria Elena Castro-Reyes), was an alien who had come to, entered, and remained in the United States in violation of law, did transport, move, attempt to transport, and attempt to move said alien in furtherance of such violation of law within the United States, namely, from a location at or near Brownsville, Texas to another location at or near McAllen, Texas and other places, by means of a motor vehicle, namely, a white-Chevrolet Cavalier, for the purpose of commercial advantage and private financial gain.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), 1324(a)(1)(B)(i).

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 982(a)(6), the United States gives notice that defendants

KARLA PATRICIA CHAVEZ JOYA (Counts 1-56)
ABELARDO FLORES (Counts 1-56)
ALFREDO GARCIA (Counts 1-56)
VICTOR SANCHEZ RODRIGUEZ (Counts 1-58)
EMMA SAPATA RODRIGUEZ (Counts 1-58)
VICTOR JESUS RODRIGUEZ (Counts 1-56)
OCTAVIO TORRES ORTEGA (Counts 1-56)
ROSA SARRATA GONZALEZ (Counts 1-56)

NORMA GONZALEZ SANCHEZ (Counts 1-56)
CLAUDIA CARRIZALES DE VILLA (Counts 1-56)
TYRONE MAPLETOFT WILLIAMS (Counts 1-56)
FATIMA HOLLOWAY (Counts 1-56)
JUAN CARLOS DON JUAN (Counts 57-58)
ERICA CARDENAS (Counts 57-58)

shall forfeit as a result of the commission of the offenses of Title 8, United States Code, Section 1324 alleged in Counts 1 through 58 of this Indictment:

(a) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and

(b) any property, real and personal -

(1) that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; or

(2) that was used to facilitate, or was intended to be used to facilitate, the commission of the offense.

The property subject to forfeiture to the United States of America includes, but is not limited to, the following property:

(1) Approximately \$ 150,000.00 in United States currency;

(2) 3100 and 3110 McAllen Road, Brownsville, Texas, along with all appurtenances and improvements thereon;

(3) 290 Roberta Circle, San Benito, Texas, along with all appurtenances and improvements thereon;

(4) 1996 Freightliner semi-tractor seized as evidence on May 14, 2003, (registered to Tyrone Williams); and

(5) United States currency seized from Tyrone Williams in the

approximate amount of \$639.50;

In the event that the property that is subject to forfeiture as a result of any act or omission of the defendant(s):

- (1) cannot be located upon exercise of due diligence;
- (2) has been placed beyond the jurisdiction of the Court;
- (3) has been transferred or sold to, or deposited with a third party;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

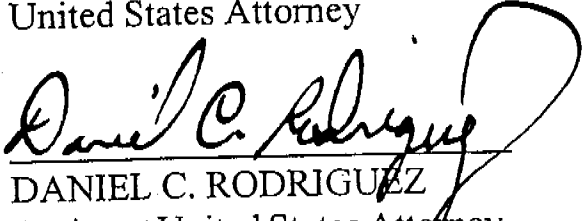
it is the intent of the United States to seek forfeiture of any other property of the defendant(s) up to the value of such property pursuant to Title 18, United States Code, Section 982(b)(1) incorporating Title 21, United States Code, Section 853(p).

A TRUE BILL:


FOREPERSON OF THE GRAND JURY

MICHAEL T. SHELBY
United States Attorney

By:


DANIEL C. RODRIGUEZ
Assistant United States Attorney
Chief, Special Offenders Section


JEFF VADEN
Assistant United States Attorney